

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
FREDRICK NORMAN	:	VIOLATIONS:
BRIANNA WALKER	:	
a/k/a "Mars,"	:	18 U.S.C. § 371 (conspiracy – 1 count)
STEPHEN NORMAN	:	18 U.S.C. §§ 922(a)(1)(A), 924(a)(1)(D)
CHARLES O'BANNON,	:	(dealing in firearms without a license – 1
a/k/a "Chizzy,"	:	count)
DEVIN CHURCH	:	18 U.S.C. 2 (aiding and abetting)
a/k/a "Lant,"	:	Notice of forfeiture
ROGER MILLINGTON	:	
ERNEST PAYTON	:	<u>FILED UNDER SEAL</u>
KENNETH BURGOS,	:	
a/k/a "Peppito,"	:	
EDWIN BURGOS,	:	
a/k/a "Rock,"	:	
ROSELMY RODRIGUEZ	:	
a/k/a "Roselmy Peralta,"	:	
BRIANNA REED	:	

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Defendant FREDRICK NORMAN was a resident of Georgia, was not a federal firearms licensee ("FFL"), and was not authorized to deal, import, or manufacture firearms under federal law.

2. Defendant BRIANNA WALKER was a resident of Georgia, was not an FFL, and was not authorized to deal, import, or manufacture firearms under federal law.

3. Defendant STEPHEN NORMAN was a resident of Georgia, was not an FFL, and was not authorized to deal, import, or manufacture firearms under federal law.

4. Defendant CHARLES O'BANNON was a resident of Georgia, was not an FFL, and was not authorized to deal, import, or manufacture firearms under federal law.

5. Defendant DEVIN CHURCH was a resident of Georgia, was not an FFL, and was not authorized to deal, import, or manufacture firearms under federal law.

6. Defendant KENNETH BURGOS was a resident of Philadelphia, Pennsylvania, was not an FFL, and was not authorized to deal, import, or manufacture firearms under federal law.

7. Defendant EDWIN BURGOS was a resident of Philadelphia, Pennsylvania, was not an FFL, and was not authorized to deal, import, or manufacture firearms under federal law.

8. Defendant ROGER MILLINGTON was a resident of Philadelphia, Pennsylvania, was not an FFL, and was not authorized to deal, import, or manufacture firearms under federal law.

9. Defendant ERNEST PAYTON was a resident of Philadelphia, Pennsylvania, was not an FFL, and was not authorized to deal, import, or manufacture firearms under federal law.

10. Defendant ROSELMY RODRIGUEZ was a resident of Philadelphia, Pennsylvania, was not an FFL, and was not authorized to deal, import, or manufacture firearms under federal law.

11. Defendant BRIANNA REED was a resident of Pennsylvania, was not an FFL, and was not authorized to deal, import, or manufacture firearms under federal law.

12. The following businesses possessed an FFL license and were authorized to deal in firearms under federal laws:

FFL	Location
Abraham's Gold and Pawn Inc.	145 Temple Avenue, Newnan, Georgia
Academy Sports + Outdoors #107	1585 Scenic Highway, Snellville, Georgia
Academy Sports + Outdoors #110	198 South Point Boulevard, McDonough, Georgia
Academy Sports + Outdoors #118	320 Peachtree Parkway, Cumming, Georgia
Academy Sports + Outdoors #124	4215 Jimmy Lee Smith Parkway, Hiram Georgia
Academy Sports + Outdoors #157	1096 Bullsboro Drive, Newnan, Georgia
Academy Sports + Outdoors #169	7200 Concourse Parkway, Douglasville, Georgia
Academy Sports + Outdoors #179	865 Shugart Road, Dalton, Georgia
Academy Sports + Outdoors #190	1689 Eisenhower Parkway, Macon, Georgia
Academy Sports + Outdoors #192	3505 Atlanta Highway, Athens, Georgia
Academy Sports + Outdoors #199	453 East Main Street, Cartersville, Georgia
Academy Sports + Outdoors #224	1140 Dawsonville Highway, Gainesville, Georgia
Academy Sports + Outdoors #257	3720 Buford Drive, Buford, Georgia
Academy Sports + Outdoors #260	1580 Crater Lake Drive, Kennesaw, Georgia
Adventure Outdoors Won LLC	2500 South Cobb Drive, Smyrna, Georgia
Arrowhead Pawn Shop	6433 Tara Blvd, Unit A, Jonesboro, Georgia
Appalachian Gun and Pawn	140 Shelby Lane, Jasper, Georgia
Cartersville Pawn	134 West Main Street, Cartersville, Georgia
Cherokee Gun & Pawn Inc.	9430 Knox Bridge Highway, Canton, Georgia
City Pawn of Bremen	523 Pacific Avenue, Bremen, Georgia
City Pawn of Carrollton LLC	903 South Park Street, Suite B, Carrollton, Georgia

City Pawn Shop	407 North Tennessee Street, Cartersville, GA
Georgia Firing Lane	2727 Canton Road, Highway #5, #410 Marietta, Georgia
Main Street Guns and Range	405 Killian Hill Road NW, Lilburn, Georgia

13. FFL holders are licensed, among other things, to sell firearms. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms.

14. The rules and regulations governing FFL holders require that a person seeking to purchase a firearm fill out a Firearm Transaction Record, ATF Form 4473 ("Form 4473"). Part of the Form 4473 requires that the prospective purchaser certify that all his or her answers on Form 4473 are true and correct. The Form 4473 requires that the prospective purchaser certify truthfully, subject to penalties of perjury, that he or she was the actual buyer of the firearm. The Form 4473 contains the following language in bold type: **"Warning: You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you."** In the certification section of the Form 4473, the actual buyer must certify that his or her answers to the questions on the form are "true, correct, and complete," and acknowledge by his or her signature that "making any false oral or written statement . . . is a crime punishable as a felony under Federal law, and may also violate State and/or local law."

15. FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer's home address and date of birth, to ensure that the person was not prohibited from purchasing a firearm.

16. From in or around June 2020 through in or around December 2020, in the Eastern District of Pennsylvania, the Northern District of Georgia, and elsewhere, defendants

**FREDRICK NORMAN
BRIANNA WALKER
a/k/a "Mars,"
STEPHEN NORMAN
CHARLES O'BANNON,
a/k/a "Chizzy,"
DEVIN CHURCH
a/k/a "Lant,"
ROGER MILLINGTON
ERNEST PAYTON
KENNETH BURGOS,
a/k/a "Peppito,"
EDWIN BURGOS,
a/k/a "Rock,"
ROSELMY RODRIGUEZ
a/k/a "Roselmy Peralta," and
BRIANNA REED**

conspired and agreed, together and with others known and unknown to the grand jury, to commit offenses against the United States, that is, to engage in the business of dealing firearms without being licensed to do so, in violation of Title 18, United States Code, Section 922(a)(1)(A); and to make a false statement with respect to the information required to be kept in the records of a federally licensed firearms dealer, in violation of Title 18, United States Code, Section 924(a)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that:

17. Defendants KENNETH BURGOS, EDWIN BURGOS, BRIANNA REED, ROSELMY RODRIGUEZ, and ROGER MILLINGTON paid defendant FREDRICK

NORMAN, using cash, Cash App, Apple Pay, Walmart-to-Walmart, and Western Union, to purchase firearms from federally licensed firearms dealers in Georgia.

18. Defendants FREDRICK NORMAN, BRIANNA WALKER, STEPHEN NORMAN, CHARLES O'BANNON, and DEVIN CHURCH purchased firearms from federally licensed firearms dealers in Georgia, knowing that the firearms were to be transported to Philadelphia for resale.

19. Defendants FREDRICK NORMAN, BRIANNA WALKER, STEPHEN NORMAN, CHARLES O'BANNON, and DEVIN CHURCH falsely stated on the Form 4473 for each firearm purchase that he or she was the actual purchaser of the firearms, when in fact they knew each statement was false and they intended to sell the firearms for profit.

20. Defendants ROGER MILLINGTON, ERNEST PAYTON, EDWIN BURGOS, and BRIANNA REED transported the firearms purchased by defendants FREDRICK NORMAN, BRIANNA WALKER, STEPHEN NORMAN, CHARLES O'BANNON, and DEVIN CHURCH from Georgia to Philadelphia, Pennsylvania, for the purpose of having KENNETH BURGOS and EDWIN BURGOS sell the firearms.

21. Defendants KENNETH BURGOS and EDWIN BURGOS then sold the firearms in and around Philadelphia for profit.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania, the Northern District of Georgia, and elsewhere:

1. On or about June 16, 2020, defendant FREDRICK NORMAN recruited defendant BRIANNA WALKER to purchase firearms in Georgia from FFLs for defendant KENNETH BURGOS.

2. On June 23, 2020, FREDRICK NORMAN purchased an H&K, model HK416, .22 caliber semi-automatic pistol, bearing serial number HB019845 from Arrowhead Pawn Shop in Jonesboro, Georgia.

3. On or about June 24, 2020:

a. Defendant FREDRICK NORMAN recruited defendants STEPHEN NORMAN, CHARLES O'BANNON, and DEVIN CHURCH to purchase firearms from FFLs in Georgia for defendant KENNETH BURGOS.

b. Defendant BRIANNA WALKER purchased the following four firearms from Arrowhead Pawn Shop in Jonesboro, Georgia: a Smith & Wesson, model M&P 40 Shield, .40 caliber semi-automatic pistol, bearing serial number JEU4921; a Smith & Wesson, model M&P 40 Shield, .40 caliber semi-automatic pistol, bearing serial number JEU8102; a Taurus, model G2S, 9mm semi-automatic pistol, bearing serial number ABE615596; and a Taurus, model G2S, 9mm semi-automatic pistol, bearing serial number ABE537524.

4. From on or about June 23, 2020 through on or about June 24, 2020:

a. Defendant ROGER MILLINGTON traveled from Philadelphia to Georgia to pick up firearms from defendant FREDRICK NORMAN.

b. Defendant ROGER MILLINGTON paid defendant FREDRICK NORMAN cash in exchange for the firearms.

c. Defendant ROGER MILLINGTON transported the firearms to Philadelphia by car.

5. On or about June 26, 2020:

a. Defendant EDWIN BURGOS transferred \$700 through Cash App to defendant ROGER MILLINGTON.

b. Defendant ROGER MILLINGTON transferred \$3,000 through Cash App to defendant STEPHEN NORMAN.

c. Defendant BRIANNA WALKER purchased the following six firearms from Adventure Outdoors Won LLC in Smyrna, Georgia: a Bersa, model BP380CC, .380 caliber semi-automatic pistol, bearing serial number E84366; a Bersa, model Thunder 380, .380 caliber semi-automatic pistol, bearing serial number F74863; a Bersa, model Thunder 9, 9mm semi-automatic pistol, bearing serial number B67627; a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABG650607; a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABG650578; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABG646726.

6. On or about June 27, 2020, defendant ROGER MILLINGTON traveled by plane from Philadelphia to Atlanta to pick up firearms from defendant FREDRICK NORMAN.

7. On or about June 28, 2020, defendant RODGER MILLINGTON transported the firearms, given to him by defendant FREDERICK NORMAN, to Philadelphia by bus.

8. On or about June 30, 2020:

a. Defendant KENNETH BURGOS and defendant FREDRICK

NORMAN discussed using defendant STEPHEN NORMAN's Cash App account to transfer money to defendant FREDRICK NORMAN.

b. Defendant ROGER MILLINGTON transferred \$3,000 through Cash App to defendant STEPHEN NORMAN.

9. On or about July 1, 2020, defendant FREDRICK NORMAN purchased the following six firearms from Adventure Outdoors Won LLC, Smyrna, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABG648049; a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABG647665; a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABG646892; a Taurus, model TH9C, 9mm semi-automatic pistol, bearing serial number ABE573391; a Taurus, model TH9C, 9mm semi-automatic pistol, bearing serial number ABE571973; and a Smith & Wesson, model SD9VE, 9mm semi-automatic pistol, bearing serial number FZL4810.

10. On or about July 3, 2020, defendant BRIANNA WALKER purchased a Taurus, model TH9C, 9mm semi-automatic pistol, bearing serial number ABE557048, from Adventure Outdoors Won LLC in Smyrna, Georgia.

11. On or about July 4, 2020:

a. Defendant ROGER MILLINGTON transferred \$45 through Apple Pay to defendant FREDRICK NORMAN.

b. Defendants ROGER MILLINGTON and FREDRICK NORMAN discussed the purchase of three firearms.

12. From on or about July 3, 2020 through on or about July 4, 2020, defendant ROGER MILLINGTON travelled from Philadelphia to Georgia to meet defendant FREDRICK NORMAN.

13. On or about July 6, 2020:

a. Defendant ROGER MILLINGTON picked up firearms from defendant FREDRICK NORMAN and transported the firearms to Philadelphia.

b. Defendant KENNETH BURGOS and FREDRICK NORMAN discussed defendant FREDRICK NORMAN purchasing firearms.

14. On or about July 7, 2020, defendant KENNETH BURGOS caused the transfer of \$1,300 to defendant FREDRICK NORMAN and \$1,140 to defendant BRIANNA WALKER through Apple Pay.

15. On or about July 8, 2020, defendant FREDRICK NORMAN purchased the following four firearms from City Pawn of Carrollton LLC in Carrollton, Georgia: a Velocity Firearms, model VMAC 45, .45 caliber semi-automatic pistol, bearing serial number P13817; a Canik55, model TP-9SF, 9mm semi-automatic pistol, bearing serial number 16AT01708; a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABE598787; and a Taurus, model G2C, .40 caliber semi-automatic pistol, bearing serial number ABE623519.

16. From on or about July 7, 2020 through on or about July 8, 2020, defendant ERNEST PAYTON travelled from Philadelphia to Georgia.

17. On or about July 9, 2020:

a. Defendant ERNEST PAYTON picked up firearms from defendant FREDRICK NORMAN and transported the firearms to Philadelphia.

b. Defendants KENNETH BURGOS and FREDRICK NORMAN discussed the purchase of firearms by defendant FREDRICK NORMAN.

18. On July 10, 2020, defendant FREDRICK NORMAN purchased the following two firearms from Adventure Outdoors Won LLC: a Glock, model 23, .40 caliber semi-automatic pistol, bearing serial number GDC6447; and a Glock, model 23, .40 caliber semi-automatic pistol, bearing serial number GDC0023.

19. On or about July 11, 2020:

a. Defendant FREDRICK NORMAN purchased a Springfield, model XDS-45, .45 caliber semi-automatic pistol, bearing serial number HG128540, from Academy Sports + Outdoors in Hiram, Georgia.

b. Defendant BRIANNA WALKER purchased a Taurus, model G2S, 9mm semi-automatic pistol, bearing serial number ABE622506, from Academy Sports + Outdoors in Hiram, Georgia.

20. On or about July 12, 2020:

a. Defendant EDWIN BURGOS transferred \$1,350 through Cash App to defendant FREDRICK NORMAN.

b. Defendants EDWIN BURGOS and FREDRICK NORMAN discussed the transfer of the seven firearms in the possession of defendant FREDRICK NORMAN to defendant EDWIN BURGOS.

c. Defendant FREDRICK NORMAN purchased the following four firearms from Academy Sports + Outdoors in Snellville, Georgia: a Glock, model 43, 9mm semi-automatic pistol, bearing serial number ADZX271; a Smith & Wesson, model M&P 9 Shield, 9mm semi-automatic pistol, bearing serial number JEP4097; a Smith & Wesson, model M&P 9 Shield, 9mm semi-automatic pistol, bearing serial number JEV4125; and a Smith & Wesson, model M&P 9 Shield, 9mm semi-automatic pistol, bearing serial number JEV4159.

d. Defendant FREDRICK NORMAN purchased the following two firearms from Academy Sports + Outdoors in Gainesville, Georgia: a Smith & Wesson, model M&P 40 Shield, .40 caliber semi-automatic pistol, bearing serial number JEU6169; and a Taurus, model G2S, 9mm semi-automatic pistol, bearing serial number ABG682394.

e. Defendant BRIANNA WALKER purchased a Taurus G2S, bearing serial number ABG678229, from Academy Sports + Outdoors in Gainesville, Georgia.

21. On or about July 13, 2020, defendant FREDRICK NORMAN purchased the following four firearms from City Pawn of Carrollton in Carrollton, Georgia: a SAR Arms, model B6, 9mm semi-automatic pistol, bearing serial number T1102-17E13979; a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABE598775; a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABE598805; and a Velocity Firearms, model VMAC 45, .45 caliber semi-automatic pistol, bearing serial number P13498.

22. On or about July 13, 2020 though on or about July 14, 2020, defendant ERNEST PAYTON travelled from Philadelphia to Georgia to pick up firearms from defendant FREDRICK NORMAN and transported the firearms to Philadelphia.

23. On or about July 16, 2020:

a. Defendants EDWIN BURGOS and FREDRICK NORMAN discussed the purchase of firearms by defendant FREDRICK NORMAN.

b. Defendant EDWIN BURGOS caused \$6,750 to be transferred through Cash App to defendant FREDRICK NORMAN.

c. Defendant FREDRICK NORMAN purchased the following nine firearms from Appalachian Gun and Pawn in Jasper, Georgia: a Smith & Wesson, model M&P 9 Shield, 9mm semi-automatic pistol, bearing serial number JEU5437; a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABE631701; a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABE620167; a Smith & Wesson, model M&P 9 Shield, 9mm semi-automatic pistol, bearing serial number JEU4749; a Smith & Wesson, model M&P 9 Shield, 9mm semi-automatic pistol, bearing serial number JEV0022; a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABB331275; a Smith & Wesson, model M&P 9 Shield, 9mm semi-automatic pistol, bearing serial number JEV0640; a Smith & Wesson, model M&P 9 Shield, 9mm semi-automatic pistol, bearing serial number JEV0034; and a Canik55, model TP-9SA, 9mm semi-automatic pistol, bearing serial number 20AP04078.

d. Defendant BRIANNA WALKER purchased the following three firearms from Appalachian Gun and Pawn in Jasper, Georgia: a Taurus, model G2S, 9mm semi-automatic pistol, bearing serial number ABE573280; a Smith & Wesson, model M&P Shield, 9mm semi-automatic pistol, bearing serial number JEU1938; and a Smith & Wesson, model M&P Shield, 9mm semi-automatic pistol, bearing serial number JEU4736.

24. On or about July 17, 2020:

a. Defendant FREDRICK NORMAN purchased the following six firearms from Appalachian Gun and Pawn in Jasper, Georgia: a Smith & Wesson, model M&P 9 Shield, 9mm semi-automatic pistol, bearing serial number JEV0654; a Smith & Wesson, model M&P 40 Shield, .40 caliber semi-automatic pistol, bearing serial number JEU4948; a Smith & Wesson, model M&P 40 Shield, .40 caliber semi-automatic pistol, bearing serial number JEU4924; and a F.N., model Five Seven, 5.7mm semi-automatic pistol, bearing serial number 386380338.

b. Defendant BRIANNA WALKER purchased the following two firearms from Cherokee Gun & Pawn in Canton, Georgia: a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABE565012; and a SCCY, model CPX-1, 9mm semi-automatic pistol, bearing serial number 786030.

25. On or about July 19, 2020, defendant ERNEST PAYTON travelled from Philadelphia to Georgia to pick up firearms from defendant FREDRICK NORMAN and transported the firearms back to Philadelphia.

26. Between on or about July 20, 2020 through on or about July 22, 2020, defendants EDWIN BURGOS and FREDRICK NORMAN discussed the purchase of firearms by defendant FREDRICK NORMAN.

27. On or about July 20, 2020, defendant EDWIN BURGOS transferred \$300 through Cash App to defendant FREDRICK NORMAN.

28. On or about July 22, 2020, defendant EDWIN BURGOS caused \$7,529 to be transferred through Cash App to defendant FREDRICK NORMAN.

29. On or about July 22, 2020, defendant FREDRICK NORMAN purchased the following three firearms from City Pawn of Carrollton in Carrollton, Georgia: a Taurus, model G2S, 9mm semi-automatic pistol, bearing serial number ABG678392; a Zastava, model ZPAP85, 5.56mm semi-automatic pistol, bearing serial number Z85-008597; and a Ruger, model AR-556, 5.56mm semi-automatic pistol, bearing serial number 858-22206.

30. On or about July 23, 2020, defendant EDWIN BURGOS caused \$350 to be transferred through Cash App to defendant FREDRICK NORMAN.

31. On or about July 24, 2020, defendant EDWIN BURGOS caused \$1,500 to be transferred through Cash App to defendant FREDRICK NORMAN.

32. On or about July 24, 2020:

a. Defendant FREDRICK NORMAN purchased the following two firearms from Cherokee Gun & Pawn Inc. in Canton, Georgia: a SCCY, model CPX-1, 9mm semi-automatic pistol, bearing serial number 801508; and a SCCY, model CPX-1, 9mm semi-automatic pistol, bearing serial number 801512.

b. Defendant BRIANNA WALKER purchased the following two firearms from Cherokee Gun & Pawn Inc in Canton, Georgia: a SCCY, model CPX-1, 9mm semi-automatic pistol, bearing serial number 801500; and a SCCY, model CPX-1, 9mm semi-automatic pistol, bearing serial number 784818.

33. On or about July 30, 2020, defendant ERNEST PAYTON travelled from Philadelphia to Georgia to pick up firearms from defendant FREDRICK NORMAN.

34. On or about August 3, 2020, defendant KENNETH BURGOS caused \$3,760 to be transferred through Western Union to defendant FREDRICK NORMAN.

35. On or about August 5, 2020, CHARLES O'BANNON purchased a Keltec, model PF9, 9mm semi-automatic pistol, bearing serial number SYU74, from City Pawn of Bremen in Bremen, Georgia.

36. On or about August 5, 2020, CHARLES O'BANNON purchased the following two firearms from City Pawn of Carrollton in Carrollton, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, serial number ABG732308; and a Taurus, model G2C, 9mm semi-automatic pistol, serial number ABH776168.

37. On or about August 9, 2020, defendant KENNETH BURGOS sent a person, unknown to the grand jury, to Georgia to pick up firearms from defendant FREDRICK NORMAN.

38. On or about August 12, 2020, defendant CHARLES O'BANNON purchased a Taurus, model G3, 9mm semi-automatic pistol, serial number ABH807772 from Cherokee Gun & Pawn Inc. in Canton, Georgia.

39. On or about August 19, 2020, defendants EDWIN BURGOS and FREDRICK NORMAN discussed the purchase of firearms by defendant FREDRICK NORMAN.

40. On or about August 20, 2020:

a. Defendant EDWIN BURGOS transferred \$2,000 through Cash App to defendant FREDRICK NORMAN.

b. Defendant FREDRICK NORMAN purchased the following four firearms from Cherokee Gun & Pawn Inc. in Canton, Georgia: a Kahr, model CW9, 9mm semi-automatic pistol, bearing serial number EH7574; a Taurus, model G3C, 9mm semi-automatic

pistol, bearing serial number ABH806615; a Glock, model 43, 9mm semi-automatic pistol, bearing serial number AEUM366; and a CAI, model Draco, 7.62mm semi-automatic pistol, bearing serial number RAS47111467.

c. Defendant BRIANNA WALKER purchased a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 457-87664, from Cherokee Gun & Pawn Inc. in Canton, Georgia.

41. On or about August 21, 2020:

a. Defendant FREDRICK NORMAN purchased a Ruger, model EC9, 9mm semi-automatic pistol, bearing serial number 457-87350, from Appalachian Gun and Pawn in Jasper, Georgia.

b. Defendant CHARLES O'BANNON purchased a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 457-89539, from Appalachian Gun and Pawn in Jasper, Georgia.

c. Defendant CHARLES O'BANNON purchased the following three firearms from Cherokee Gun & Pawn Inc. in Canton, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABH794177; a Taurus, model G3C, 9mm semi-automatic pistol, bearing serial number ABH775815; and a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 457-87615.

42. On or about August 23, 2020, defendant FREDRICK NORMAN purchased a Smith & Wesson, model SD9VE, 9mm semi-automatic pistol, bearing serial number FCM7569, from Academy Sports + Outdoors in Hiram, Georgia.

43. On or about August 22, 2020, defendant ERNEST PAYTON travelled from Philadelphia to Georgia.

44. On or about August 23, 2020, defendant ERNEST PAYTON picked up firearms from defendant FREDRICK NORMAN and transported the firearms to Philadelphia.

45. On or about August 24, 2020, defendant FREDRICK NORMAN purchased a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20S02183, from Adventure Outdoors Won LLC in Smyrna, Georgia.

46. On or about August 25, 2020:

a. Defendant EDWIN BURGOS transferred \$1,450 through Cash App to defendant FREDRICK NORMAN.

b. Defendant CHARLES O'BANNON purchased the following three firearms from Adventure Outdoors Won LLC, Smyrna, Georgia: a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 457-86562; a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20S02185; and a SAR, model CM9, 9mm semi-automatic pistol, bearing serial number T1102-20BD50625.

47. On or about August 26, 2020:

a. Defendant STEPHEN NORMAN purchased a Stoeger, model STR9C, 9mm semi-automatic pistol, bearing serial number T6429-20S02748, from Adventure Outdoors Won LLC in Smyrna, Georgia.

b. Defendant FREDRICK NORMAN purchased the following four firearms from Academy Sports + Outdoors in Cumming, Georgia: a Taurus, model TH9, 9mm semi-automatic pistol, bearing serial number ABJ855086; a Stoeger, model STR-9, 9mm semi-

automatic pistol, bearing serial number T6429-20U07084; a Taurus, model G2C, 9mm semi-automatic pistol, serial number ABH818097; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABH818095.

48. On or about August 27, 2020:

a. Defendant FREDRICK NORMAN purchased the following two firearms from Academy Sports + Outdoors in Cartersville, Georgia: a Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol, bearing serial number FCK4204; and a Smith & Wesson, model SD9VE, 9mm semi-automatic pistol, bearing serial number FCF9986.

b. Defendant FREDRICK NORMAN and EDWIN BURGOS discussed defendant EDWIN BURGOS sending someone to meet defendant FREDRICK NORMAN.

c. Defendant ERNEST PAYTON travelled from Philadelphia to Georgia to pick up firearms from defendant FREDRICK NORMAN.

49. From on or about August 28, 2020 through on or about August 29, 2020, defendant ERNEST PAYTON transported the firearms he obtained from defendant FREDRICK NORMAN to Philadelphia.

50. On or about August 28, 2020, defendants KENNETH BURGOS, EDWIN BURGOS, and FREDRICK NORMAN discussed the purchase of firearms by defendant FREDRICK NORMAN.

51. On or about August 29, 2020, defendant EDWIN BURGOS transferred \$1,330 through Cash App to defendant FREDRICK NORMAN.

52. On or about August 31, 2020, defendant EDWIN BURGOS caused the

transfer of \$3,620 through Cash App to defendant FREDRICK NORMAN.

53. On or about August 31, 2020:

a. Defendant CHARLES O'BANNON purchased the following two firearms from Cherokee Gun & Pawn Inc. in Canton, Georgia: a Ruger, model Security-9, 9mm semi-automatic pistol, bearing serial number 383-55479; and a Walther, model PPS, 9mm semi-automatic pistol, bearing serial number AF7606.

b. Defendant CHARLES O'BANNON purchased a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U07038, from Academy Sports + Outdoors in Gainesville, Georgia.

54. On or about September 1, 2020:

a. Defendants KENNETH BURGOS and FREDRICK NORMAN discussed the current prices for certain models of firearms.

b. Defendant CHARLES O'BANNON purchased the following three firearms from Academy Sports + Outdoors in Dalton, Georgia: a Taurus, model G3C, 9mm semi-automatic pistol, bearing serial number ABH847272; a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 457-91806; and a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABH821551.

55. On or about September 2, 2020:

a. Defendant EDWIN BURGOS transferred \$450 through Cash App to defendant FREDRICK NORMAN.

b. Defendants EDWIN BURGOS and FREDRICK NORMAN discussed the payment owed for firearms purchases.

c. Defendant FREDRICK NORMAN purchased the following two firearms from Cherokee Gun & Pawn Inc. in Canton, Georgia: a Taurus, model PT140, .40 caliber semi-automatic pistol, bearing serial number SIR37311; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABH839281.

d. Defendant FREDRICK NORMAN purchased the following two firearms from Academy Sports + Outdoors in Dalton, Georgia: a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 457-91675; and a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 457-91356.

e. Defendant FREDRICK NORMAN purchased a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U07008, from Academy Sports + Outdoors in Hiram, Georgia.

f. Defendant ERNEST PAYTON travelled from Philadelphia to Georgia to pick up firearms from defendant FREDRICK NORMAN.

56. On or about September 3, 2020, defendant ERNEST PAYTON transported the firearms he obtained from defendant FREDRICK NORMAN to Philadelphia.

57. On or about September 4, 2020:

a. Defendants EDWIN BURGOS and FREDRICK NORMAN discussed the purchase of firearms by defendant FREDRICK NORMAN.

b. Defendant EDWIN BURGOS caused the transfer of \$4,950 through Cash App to defendant FREDRICK NORMAN.

c. Defendant CHARLES O'BANNON purchased the following three firearms from Adventure Outdoors Won LLC in Smyrna, Georgia: a SAR, model CM9, 9mm

semi-automatic pistol, bearing serial number T1102-20BD50641; a SAR, model B6, 9mm semi-automatic pistol, bearing serial number T1102-20E03235; and a SAR, model B6, 9mm semi-automatic pistol, bearing serial number T1102-20E03517.

d. Defendant CHARLES O'BANNON purchased the following two firearms from Cherokee Gun & Pawn Inc. in Canton, Georgia: a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 457-87841; and a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 457-87847.

58. On or about September 5, 2020:

a. Defendant EDWIN BURGOS transferred \$90 through Cash App to defendant FREDRICK NORMAN.

b. Defendant FREDRICK NORMAN transferred \$340 through Apple Pay to defendant DEVIN CHURCH.

c. Defendant DEVIN CHURCH purchased a SAR USA, model CM9, 9mm semi-automatic pistol, bearing serial number T1102-20BD50652, from Adventure Outdoors Won LLC in Smyrna, Georgia.

d. Defendant STEPHEN NORMAN purchased a SAR USA, model CM9, 9mm semi-automatic pistol, bearing serial number T1102-20BD50636, from Adventure Outdoors Won LLC in Smyrna, Georgia.

59. On or about September 6, 2020:

a. Defendants EDWIN BURGOS and FREDRICK NORMAN discussed the purchase of firearms by defendant FREDRICK NORMAN.

b. Defendant ERNEST PAYTON travelled from Philadelphia to

Georgia to pick up firearms from defendant FREDRICK NORMAN.

c. Defendant FREDRICK NORMAN purchased a Canik, TP9SF, 9mm semi-automatic pistol, bearing serial number 20AT30420, from Academy Sports + Outdoors in Cartersville, Georgia.

d. Defendant FREDRICK NORMAN purchased a Stoeger, model STR9, 9mm semi-automatic pistol, bearing serial number T6429-20U07659, from Academy Sports + Outdoors in Dalton, Georgia.

e. Defendant FREDRICK NORMAN purchased a Canik, model TP9SF, 9mm semi-automatic pistol, bearing serial number 20AT30331, from Academy Sports + Outdoors in Cumming, Georgia.

f. Defendant FREDRICK NORMAN purchased a Canik, model TP9SF, 9mm semi-automatic pistol, bearing serial number 20AT31266, from Academy Sports + Outdoors in Douglasville, Georgia.

60. From on or about September 8, 2020 through on or about September 9, 2020:

a. Defendant EDWIN BURGOS transferred \$965 through Cash App to defendant FREDRICK NORMAN.

b. Defendant EDWIN BURGOS caused \$4,885 to be transferred through Apple Pay to defendant FREDRICK NORMAN.

61. On or about September 10, 2020:

a. Defendants FREDRICK NORMAN and CHARLES O'BANNON discussed defendant O'BANNON's purchase of firearms.

b. Defendant CHARLES O'BANNON purchased the following three firearms from Academy Sports + Outdoors in Cartersville, Georgia: a Taurus, model G3C, 9mm semi-automatic pistol, bearing serial number ABH852862; a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABH824455; and a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 457-92291.

c. Defendant CHARLES O'BANNON purchased a Taurus, model G3C, 9mm semi-automatic pistol, bearing serial number ABJ898166, from City Pawn Shop in Cartersville, Georgia.

d. Defendant FREDRICK NORMAN transferred \$320 through Apple Pay to defendant DEVIN CHURCH.

e. Defendant DEVIN CHURCH purchased a Taurus, model TH9C, 9mm semi-automatic pistol, bearing serial number TMC15868, from City Pawn of Carrollton LLC in Carrollton, Georgia using the money provided by defendant FREDRICK NORMAN.

62. On or about September 11, 2020:

a. Defendant CHARLES O'BANNON purchased the following two firearms from Academy Sports + Outdoors in Kennesaw, Georgia: a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABJ871636; and a Canik, model TP9SF, 9mm semi-automatic pistol, bearing serial number 20AT31215.

b. Defendant CHARLES O'BANNON purchased a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U07887, from Academy Sports + Outdoors in Hiram, Georgia.

c. Defendant CHARLES O'BANNON purchased the following three

firearms from Cartersville Pawn in Cartersville, Georgia: a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABH840139; a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABG646262; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABH847999.

63. On or about September 12, 2020:

a. Defendant EDWIN BURGOS transferred \$150 through Cash App to defendant FREDRICK NORMAN.

b. Defendant FREDRICK NORMAN purchased the following two firearms from Academy Sports + Outdoors in Buford, Georgia: a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 457-91950; and a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 457-92143.

c. Defendant FREDRICK NORMAN told defendant EDWIN BURGOS that the firearms were ready for pickup.

64. On or about September 12, 2020 through on or about September 14, 2020, defendant ERNEST PAYTON travelled from Philadelphia to Georgia to pick up firearms from defendant FREDRICK NORMAN and transported the firearms to Philadelphia.

65. On or about September 14, 2020 through September 16, 2020, defendants EDWIN BURGOS and FREDRICK NORMAN discussed the purchase of additional firearms by defendant FREDRICK NORMAN.

66. On or about September 18, 2020:

a. Defendant EDWIN BURGOS caused the transfer of \$6,000 through Walmart-to-Walmart and Apple Pay to defendant FREDRICK NORMAN.

b. Defendant FREDRICK NORMAN purchased a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 457-93835, from Mainstreet Guns and Range in Lilburn, Georgia.

c. Defendant BRIANNA WALKER purchased a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 457-94409, from Mainstreet Guns and Range in Lilburn, Georgia.

67. On or about September 19, 2020:

a. Defendant FREDRICK NORMAN purchased an SDS-Zicana, model PX9, 9mm semi-automatic pistol, bearing serial number T0620-20BM08175, from Adventure Outdoors Won LLC Smyrna, Georgia.

b. Defendant BRIANNA WALKER purchased a SAR USA, model B6, 9mm semi-automatic pistol, bearing serial number T1102-20E03528, from Adventure Outdoors Won LLC, Smyrna, Georgia.

c. Defendant STEPHEN NORMAN purchased a SCCY, model CPX-1, 9mm semi-automatic pistol, bearing serial number C010686, from Adventure Outdoors Won LLC in Smyrna, Georgia.

d. Defendant STEPHEN NORMAN purchased the following two firearms from Mainstreet Guns and Range, Lilburn, Georgia: a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 457-93810; and a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 457-93861.

68. On or about September 20, 2020, defendant FREDRICK NORMAN instructed defendant STEPHEN NORMAN to purchase a Taurus firearm from City Pawn of

Carrollton in Carrollton, Georgia.

69. On or about September 21, 2020:

a. Defendant STEPHEN NORMAN purchased a Taurus, model PT140 G2, .40 caliber semi-automatic pistol, bearing serial number ABJ904448, from City Pawn of Carrollton LLC in Carrollton, Georgia.

b. Defendant FREDRICK NORMAN purchased the following two firearms from Abraham's Gold and Pawn Inc. in Newnan, Georgia: a Century, model C39V2, 7.62mm semi-automatic pistol, serial number C39P2A05579; and a Stoeger, model STR-9C, 9mm semi-automatic pistol, serial number T6429-20502866.

c. Defendant FREDRICK NORMAN purchased a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABH842226, from Academy Sports + Outdoors in Newnan, Georgia.

d. BRIANNA WALKER purchased a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABH842227, from Academy Sports + Outdoors in Newnan, Georgia.

70. On or about September 21, 2020, defendants FREDRICK NORMAN and EDWIN BURGOS discussed defendant EDWIN BURGOS sending someone to pick up firearms.

71. On or about September 22, 2020:

a. Defendant BRIANNA WALKER purchased the following two firearms from Abraham's Gold and Pawn Inc. in Newnan, Georgia: a Glock, model 23C, .40 caliber semi-automatic pistol, bearing serial number ABKK586; and a Glock, model 27, .40

caliber semi-automatic pistol, bearing serial number BPKE598

b. Defendant ERNEST PAYTON travelled from Philadelphia to Georgia to pick up firearms from defendant FREDRICK NORMAN and transported the firearms to Philadelphia.

72. On or about September 24, 2020:

a. Defendant FREDRICK NORMAN purchased the following two firearms from Abraham's Gold and Pawn Inc. in Newnan, Georgia: a Glock, model 19, 9mm semi-automatic pistol, bearing serial number BREG394; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABH808311.

b. Defendant CHARLES O'BANNON purchased a Glock, model 43, 9mm semi-automatic pistol, bearing serial number AEWL261, from Abraham's Gold and Pawn Inc. in Newnan, Georgia.

73. On or about September 26, 2020:

a. Defendant BRIANNA WALKER purchased a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABK990311, from Cartersville Pawn in Cartersville, Georgia.

b. Defendant BRIANNA WALKER purchased a Glock, model 26, 9mm semi-automatic pistol, serial number BRBX328, from Adventure Outdoors Won LLC in Smyrna, Georgia.

c. Defendant FREDRICK NORMAN purchased the following two firearms from Cartersville Pawn in Cartersville, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, serial number ABK977513; and a Smith & Wesson, model SD9VE, 9mm semi-

automatic pistol, serial number FBH3711.

d. Defendant FREDRICK NORMAN purchased a Glock, model 26, 9mm semi-automatic pistol, bearing serial number BRBX327, from Adventure Outdoors Won LLC in Smyrna, Georgia.

e. Defendant CHARLES O'BANNON purchased the following four firearms from Adventure Outdoors Won LLC in Smyrna, Georgia: a SAR, model B6, 9mm semi-automatic pistol, serial number T1102-20E03368; a SAR, model B6, 9mm semi-automatic pistol, bearing serial number T1102-20E02730; a Glock, model 26, 9mm semi-automatic pistol, serial number BRBX330; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ917689.

f. Defendant CHARLES O'BANNON purchased the following two firearms from City Pawn of Bremen in Bremen Georgia: a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABC348586; and a SCCY, model CPX-2, 9mm semi-automatic pistol, bearing serial number C001681.

g. Defendant FREDRICK NORMAN transferred \$650 through Apple Pay to defendant STEPHEN NORMAN and directed defendant STEPHEN NORMAN to purchase firearms from City Pawn of Bremen in Bremen, Georgia.

h. Defendant STEPHEN NORMAN purchased the following firearms two from City Pawn of Bremen in Bremen, Georgia: a SCCY, model CPX-2, 9mm semi-automatic pistol, bearing serial number C000313; and a SCCY, model CPX-2, 9mm semi-automatic pistol, bearing serial number C001683.

i. Defendant STEPHEN NORMAN purchased the following two

firearms from Adventure Outdoors Won LLC in Smyrna, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ923092; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ923072.

74. On or about September 26, 2020 through on or about September 28, 2020, defendant ERNEST PAYTON travelled from Philadelphia to Georgia to pick up firearms from defendant FREDRICK NORMAN and transported the firearms to Philadelphia.

75. On or about September 28, 2020; BRIANNA WALKER purchased a Glock, model 26, 9mm semi-automatic pistol, bearing serial number BRBX150, from Academy Sports + Outdoors in Douglasville, Georgia.

76. On or about September 29, 2020:

a. Defendant EDWIN BURGOS and FREDRICK NORMAN discussed the purchase of firearms by defendant FREDRICK NORMAN.

b. Defendant EDWIN BURGOS caused the transfer of \$2,500 through Walmart-to-Walmart to defendant FREDRICK NORMAN.

c. Defendant EDWIN BURGOS caused the transfer of \$3,500 through Apple Pay to defendant FREDRICK NORMAN.

77. On or about September 30, 2020:

a. Defendants EDWIN BURGOS and FREDRICK NORMAN discussed the purchase of firearms by defendant FREDRICK NORMAN.

b. Defendant EDWIN BURGOS caused the transfer of \$1,150 through Apple Pay to defendant FREDRICK NORMAN.

c. Defendant FREDRICK NORMAN purchased a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ931509, from Academy Sports + Outdoors in Douglasville, Georgia.

78. On or about October 1, 2020:

a. Defendant ROSELMY RODRIGUEZ, transferred \$900 through Cash App to defendant FREDRICK NORMAN.

b. Defendant FREDRICK NORMAN purchased the following two firearms from Academy Sports + Outdoors in Hiram, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ959038; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ959228.

c. Defendant FREDRICK NORMAN purchased the following two firearms from Academy Sports + Outdoors in McDonough, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ933152; and a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U07082.

d. Defendant BRIANNA WALKER purchased a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ949538, from Academy Sports + Outdoors in McDonough, Georgia.

e. Defendant CHARLES O'BANNON purchased the following three firearms from Academy Sports + Outdoors in Newnan, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ959614; a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABK966420; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ959654.

f. Defendant CHARLES O'BANNON purchased the following two firearms from Academy Sports + Outdoors in Douglasville, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ937774; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ934011.

g. Defendant STEPHEN NORMAN purchased the following two firearms from Academy Sports + Outdoors in Douglasville, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ933681; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ931739.

79. On or about October 2, 2020:

a. Defendant FREDRICK NORMAN purchased the following two firearms from Academy Sports + Outdoors in Bullsboro Drive, Newnan, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABK963503; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABK963332.

b. Defendant FREDRICK NORMAN purchased a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ937625, from Academy Sports + Outdoors in Cumming, Georgia.

c. Defendant ERNEST PAYTON travelled from Philadelphia to Atlanta to pick up firearms from defendant FREDRICK NORMAN and transported the firearms to Philadelphia.

80. On or about October 4, 2020, defendant ROSELMY RODRIGUEZ transferred \$4,000 through Cash App to defendant FREDRICK NORMAN.

81. On or about October 5, 2020:

a. Defendant ROSELMY RODRIGUEZ transferred \$2,450 through Cash App to defendant FREDRICK NORMAN.

b. Defendant FREDRICK NORMAN purchased the following two firearms from Adventure Outdoors Won LLC in Smyrna, Georgia: a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABJ946815; and an SDS-Zicana, model PX9, 9mm semi-automatic pistol, bearing serial number T0620-20BM08109.

c. Defendant FREDRICK NORMAN purchased a Taurus, model PT740, .40 caliber semi-automatic pistol, bearing serial number SER23556, from Cherokee Gun & Pawn Inc. in Canton, Georgia.

d. Defendant STEPHEN NORMAN purchased a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABH842297, from Academy Sports + Outdoors in Cumming, Georgia.

82. On or about October 6, 2020:

a. Defendant CHARLES O'BANNON purchased the following two firearms from Cartersville Pawn in Cartersville, Georgia: a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABK015180; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABK993628.

b. Defendant CHARLES O'BANNON purchased a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABK998867, from City Pawn Shop in Cartersville, Georgia.

c. Defendant STEPHEN NORMAN purchased a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABJ871610 from Academy Sports + Outdoors in Newnan, Georgia.

d. Defendant BRIANNA WALKER purchased the following two firearms from Cartersville Pawn in Cartersville, Georgia: a Glock, model 27, .40 caliber semi-automatic pistol, bearing serial number EHN837; and a Glock, model 30, .45 caliber semi-automatic pistol, bearing serial number BPUV689.

83. On or about October 7, 2020:

a. Defendant FREDRICK NORMAN purchased the following two firearms from Abraham's Gold and Pawn Inc. in Newnan, Georgia: a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 457-92015; and a Glock, model 23, .40 caliber semi-automatic pistol, bearing serial number AESR008.

b. Defendant BRIANNA WALKER purchased the following two firearms from Academy Sports + Outdoors at Newnan, Georgia: a Glock, model 19, 9mm semi-automatic pistol, bearing serial number BRBL862; and a Glock, model 26, 9mm semi-automatic pistol, bearing serial number BPTZ570.

c. Defendant CHARLES O'BANNON purchased the following two firearms from Academy Sports + Outdoors in Hiram, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ949933; and a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABH827269.

d. Defendant CHARLES O'BANNON purchased a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABJ871168, from Academy Sports + Outdoors in Douglasville, Georgia.

e. Defendant STEPHEN NORMAN purchased a FN, model 509, 9mm semi-automatic pistol, bearing serial number GK50130904, from Adventure Outdoors Won LLC in Smyrna, Georgia.

84. On or about October 8, 2020:

a. Defendant ROSELMY RODRIGUEZ transferred \$450 through Apple Pay to defendant FREDRICK NORMAN.

b. Defendant FREDRICK NORMAN purchased the following three firearms from Academy Sports + Outdoors in Dalton, Georgia: a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 458-04794; a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 458-04917; and a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U08804.

c. Defendant FREDRICK NORMAN purchased a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 458-11734, from Academy Sports + Outdoors in Douglasville, Georgia.

d. Defendant ERNEST PAYTON travelled from Philadelphia to Georgia to pick up firearms from defendant FREDRICK NORMAN and transported the firearms to Philadelphia.

85. On or about October 9, 2020:

a. Defendant EDWIN BURGOS transferred \$450 through Apple Pay to defendant FREDRICK NORMAN.

b. Defendant FREDRICK NORMAN purchased a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 458-13039, from Academy Sports + Outdoors in Kennesaw, Georgia.

c. Defendant ERNEST PAYTON travelled from Philadelphia to Georgia to pick up firearms from defendant FREDRICK NORMAN and transported the firearms to Philadelphia.

86. On or about October 10, 2020:

a. Defendants EDWIN BURGOS and FREDRICK NORMAN discussed the purchase of firearms by defendant FREDRICK NORMAN.

b. Defendant ERNEST PAYTON transferred \$2,000 through Cash App to defendant EDWIN BURGOS \$2,000.

c. Defendant EDWIN BURGOS transferred \$5,900 through Cash App to defendant FREDRICK NORMAN.

d. Defendant EDWIN BURGOS transferred \$500 through Apple Pay to defendant FREDRICK NORMAN.

87. On or about October 12, 2020:

a. Defendant FREDRICK NORMAN purchased the following two firearms from Abraham's Gold and Pawn Inc. in Newnan, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ937174; a Taurus, model G2C, 9mm semi-

automatic pistol, bearing serial number ABG733803; and a Charles Daly, model Honcho Tactical, 12-gauge shotgun, bearing serial number 20PA12V-1049.

b. Defendant BRIANNA WALKER purchased the following two firearms from Abraham's Gold and Pawn Inc. in Newnan, Georgia: a Glock, model 43, 9mm semi-automatic pistol, bearing serial number ADZV576; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABG733875.

c. Defendant STEPHEN NORMAN purchased a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 458-07351, from Academy Sports + Outdoors in Hiram, Georgia.

88. On or about October 13, 2020:

a. Defendant ROSELMY RODRIGUEZ transferred \$1,900 through Cash App to defendant FREDRICK NORMAN.

b. Defendant CHARLES O'BANNON purchased the following three firearms from Georgia Firing Line in Marietta, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ937939; a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ938501; and a Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol, bearing serial number DUK0733.

c. Defendant STEPHEN NORMAN purchased a Troy, model Carbine, 5.56mm semi-automatic rifle, bearing serial number F11194104, from Abraham's Gold and Pawn Inc. in Newnan, Georgia.

89. On or about October 14, 2020:

a. Defendant FREDRICK NORMAN purchased a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U07010, from Academy Sports + Outdoors in Macon, Georgia.

b. Defendant FREDRICK NORMAN purchased the following four firearms from Academy Sports + Outdoors in McDonough, Georgia: a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 458-07019; a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 458-07052; a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 458-07320; and a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 458-12891.

c. Defendant FREDRICK NORMAN purchased the following two firearms from Academy Sports + Outdoors in Hiram, Georgia: a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 458-12246; and a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 458-07039.

d. Defendant FREDRICK NORMAN purchased an MPA, model MPA30T, 9mm semi-automatic pistol, bearing serial number FX15843, from GA Firing Line in Marietta, Georgia.

e. Defendant BRIANNA WALKER purchased a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ943284, from Academy Sports + Outdoors in Macon, Georgia.

f. Defendant CHARLES O'BANNON purchased a SCCY, model CPX-2, 9mm semi-automatic pistol, bearing serial number C032517, from Academy Sports + Outdoors in Cumming, Georgia.

g. Defendant CHARLES O'BANNON purchased a SCCY, model CPX-2, 9mm semi-automatic pistol, bearing serial number C032507, from Academy Sports + Outdoors Snellville, Georgia.

h. Defendant STEPHEN NORMAN purchased the following two firearms from Academy Sports + Outdoors in Snellville, Georgia: a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 458-07311; and a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 458-13128.

90. On or about October 15, 2020, defendant ERNEST PAYTON travelled from Philadelphia to Georgia to pick up firearms from defendant FREDRICK NORMAN and transported the firearms to Philadelphia.

91. On or about October 15, 2020, defendant FREDRICK NORMAN purchased a SAR Arms, model 2000, 9mm semi-automatic pistol, bearing serial number T1102-19B04765, from Adventure Outdoors Won LLC in Smyrna, Georgia.

92. On or about October 16, 2020, defendant CHARLES O'BANNON purchased the following two firearms from Big Woods Goods, 350 Ronnell Rd, Canton, Georgia 30115: a Glock, model 26, 9mm semi-automatic pistol, bearing serial number BPTZ767; and a Glock, model 19, 9mm semi-automatic pistol, bearing serial number BREP341.

93. On or about October 19, 2020:

- a. Defendants ROSELMY RODRIGUEZ and FREDRICK NORMAN discussed the purchase of firearms by defendant FREDRICK NORMAN.
- b. Defendant BRIANNA WALKER purchased a Springfield, model Hellcat, 9mm semi-automatic pistol, bearing serial number BY391042, from Academy Sports + Outdoors in Douglasville, Georgia.

94. On or about October 20, 2020:

- a. Defendants ROSELMY RODRIGUEZ and FREDRICK NORMAN discussed the purchase of firearms by defendant FREDRICK NORMAN.
- b. Defendant ROSELMY RODRIGUEZ transferred \$2,500 through Walmart-to-Walmart to defendant FREDRICK NORMAN.
- c. Defendant FREDRICK NORMAN purchased a Glock, model 26, 9mm semi-automatic pistol, bearing serial number BRBW713, from Academy Sports + Outdoors in Athens, Georgia.

95. On or about October 21, 2020:

- a. Defendant CHARLES O'BANNON purchased the following three firearms from Adventure Outdoors Won LLC in Smyrna, Georgia: a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U10663; a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U10660; and a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U10661.
- b. Defendants ROSELMY RODRIGUEZ, FREDRICK NORMAN, and EDWIN BURGOS discussed the three firearms already purchased by defendant FREDRICK

NORMAN and defendant FREDRICK NORMAN returning the remaining money meant for additional firearms purchases.

c. Defendant FREDRICK NORMAN transferred \$750 through Apple Pay to defendant ROSELMY RODRIGUEZ.

96. On or about October 26, 2020, defendants EDWIN BURGOS and FREDRICK NORMAN discussed defendant EDWIN BURGOS travelling to pick up firearms from defendant FREDRICK NORMAN.

97. On or about October 28, 2020:

a. Defendant EDWIN BURGOS caused the transfer of \$3,200 through Cash App to defendant BRIANNA WALKER.

b. Defendants EDWIN BURGOS and BRIANNA REED travelled from Philadelphia to Georgia to pick up firearms from defendant FREDRICK NORMAN.

98. On or about October 29, 2020:

a. Defendant FREDRICK NORMAN purchased the following two firearms from Adventure Outdoors Won LLC in Smyrna, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABL088627; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABL088668.

b. Defendant BRIANNA WALKER purchased a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABL088129, from Adventure Outdoors Won LLC in Smyrna, Georgia.

c. Defendant BRIANNA WALKER purchased a Springfield, model Hellcat, 9mm semi-automatic pistol, bearing serial number BY420388, from Academy Sports + Outdoors in Snellville, Georgia.

d. Defendant CHARLES O'BANNON purchased the following three firearms from Academy Sports + Outdoors in Douglasville, Georgia: a SCCY, model CPX-2, 9mm semi-automatic pistol, bearing serial number C030475; a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABL093519; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABL093202.

99. On or about November 3, 2020:

a. Defendant BRIANNA REED transferred \$1,500 through Apple Pay to defendant BRIANNA WALKER.

b. Defendant EDWIN BURGOS caused a transfer totaling \$2,980 through Cash App to defendant DEVIN CHURCH.

100. On or about November 4, 2020:

a. Defendant BRIANNA REED transferred \$700 through Apple Pay to defendant BRIANNA WALKER.

b. Defendant FREDRICK NORMAN purchased the following two firearms from Academy Sports + Outdoors in Cartersville, Georgia: a SCCY, model CPX-2, 9mm semi-automatic pistol, bearing serial number C030604; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ908551.

c. Defendant FREDRICK NORMAN purchased the following three firearms from Cartersville Pawn in Cartersville, Georgia: a Taurus, model G2C, 9mm semi-

automatic pistol, bearing serial number ABG733746; a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABK981714; and a Glock, model 19x, 9mm semi-automatic pistol, bearing serial number BRPW460.

d. Defendant CHARLES O'BANNON purchased the following two firearms from Academy Sports + Outdoors in Cumming, Georgia: a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U10091; and a SCCY, model CPX-2, 9mm semi-automatic pistol, bearing serial number C030089.

e. Defendant CHARLES O'BANNON purchased the following two firearms from Georgia Firing Line in Marietta, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABK078230; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ937839.

f. Defendant CHARLES O'BANNON purchased the following two firearms from Academy Sports + Outdoors in McDonough, Georgia: a SCCY, model CPX-2, 9mm semi-automatic pistol, bearing serial number C029719; and a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U10119.

101. On or about November 5, 2020, defendant EDWIN BURGOS travelled from Philadelphia to Georgia to pick up firearms from defendant FREDRICK NORMAN and transported the firearms to Philadelphia.

102. On or about November 7, 2020:

a. Defendant FREDRICK NORMAN purchased a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U10020, from Academy Sports + Outdoors in Buford, Georgia.

b. Defendant FREDRICK NORMAN purchased a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABL082282, from Georgia Firing Line in Marietta, Georgia.

103. On November 8, 2020, defendant EDWIN BURGOS and FREDRICK NORMAN discussed the purchase of firearms by defendant FREDRICK NORMAN.

104. On or about November 9, 2020:

a. Defendant BRIANNA REED transferred \$1,650 through Apple Pay to FREDRICK NORMAN.

b. Defendant FREDRICK NORMAN purchased the following two firearms from Abraham's Gold and Pawn Inc. in Newnan, Georgia: a Glock, model 48, 9mm semi-automatic pistol, bearing serial number BRLF503; and a Glock, model 43, 9mm semi-automatic pistol, bearing serial number AEWH303.

c. Defendant BRIANNA WALKER purchased a Glock, model 19, 9mm semi-automatic pistol, bearing serial number SVW132, from Abraham's Gold and Pawn Inc. in Newnan, Georgia.

105. On or about November 10, 2020:

a. Defendant EDWIN BURGOS caused the transfer of \$4,400 through Apple Pay to defendant FREDRICK NORMAN.

b. Defendant BRIANNA WALKER purchased a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABL094253, from Academy Sports + Outdoors in Buford, Georgia.

106. On or about November 11, 2020:

a. Defendant FREDRICK NORMAN purchased the following two firearms from Academy Sports + Outdoors in McDonough, Georgia: a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U11628; and a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U10128.

b. Defendant FREDRICK NORMAN purchased a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U11083, from Academy Sports + Outdoors in Douglasville, Georgia.

c. Defendant FREDRICK NORMAN purchased the following two firearms from Academy Sports + Outdoors in Hiram, Georgia: a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U11202; and a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U11203.

d. Defendant CHARLES O'BANNON purchased a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U10142, from Academy Sports + Outdoors in Hiram, Georgia.

e. Defendant CHARLES O'BANNON purchased the following four firearms from Abraham's Gold and Pawn Inc. in Newnan, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABL081554; a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABL081443; a Taurus, model G3C, 9mm semi-automatic pistol, bearing serial number ABL115307; and a Taurus, model G3C, 9mm semi-automatic pistol, bearing serial number ABL090156.

f. Defendant BRIANNA REED travelled from Philadelphia to Georgia to pick up firearms from defendant FREDRICK NORMAN and transported the firearms to Philadelphia.

107. On or about November 14, 2020, defendant BRIANNA REED transferred \$2,000 through Apple Pay to defendant FREDRICK NORMAN.

108. On or about November 15, 2020, defendants FREDRICK NORMAN and EDWIN BURGOS discussed the purchase of firearms by defendant FREDRICK NORMAN.

109. On or about November 16, 2020:

a. Defendant FREDRICK NORMAN purchased the following three firearms from Academy Sports + Outdoors in Athens, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ914282; a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ914281; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ914407.

b. Defendant FREDRICK NORMAN purchased the following three firearms from Academy Sports + Outdoors in Cartersville, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ944052; a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ949867; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ950243.

110. On or about November 17, 2020:

a. Defendants EDWIN BURGOS and FREDRICK NORMAN discussed defendant EDWIN BURGOS sending someone to meet defendant FREDRICK NORMAN to pick up firearms.

b. Defendant FREDRICK NORMAN purchased the following two firearms from Academy Sports + Outdoors in Cartersville, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABK016790; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABK016702.

c. Defendant BRIANNA WALKER purchased the following two firearms from Academy Sports + Outdoors in Cartersville, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ950322; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABL094159.

111. On or about November 19, 2020:

a. Defendants EDWIN BURGOS and FREDRICK NORMAN discussed the purchase of firearms by defendant FREDRICK NORMAN.

b. Defendant BRIANNA REED transferred \$4,960 through Cash App to defendant FREDRICK NORMAN.

112. On or about November 20, 2020:

a. Defendant BRIANNA REED transferred \$1,050 through Apple Pay to defendant FREDRICK NORMAN.

b. Defendant FREDRICK NORMAN purchased the following two firearms from Academy Sports + Outdoors in Kennesaw, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABK016742; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABK016665.

c. Defendant FREDRICK NORMAN purchased the following two firearms from Academy Sports + Outdoors in Cartersville, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ949910; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABJ950382.

d. Defendant BRIANNA WALKER purchased the following two firearms from Academy Sports + Outdoors in Kennesaw, Georgia: a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U11000; and a Stoeger, model STR-9, 9mm semi-automatic pistol, bearing serial number T6429-20U10983.

e. Defendant BRIANNA WALKER purchased the following two firearms from Academy Sports + Outdoors in Cartersville, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABK016914; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABK016795.

113. On or about November 21, 2020:

a. FREDRICK NORMAN purchased the following two firearms from Academy Sports + Outdoors in Newnan, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABK986101; and Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABL093031.

b. Defendant EDWIN BURGOS sent a person, who is unknown to the grand jury, to pick up firearms from defendant FREDRICK NORMAN.

114. On or about November 25, 2020, defendants EDWIN BURGOS and FREDRICK NORMAN discussed the purchase of firearms by defendant FREDRICK NORMAN.

115. On or about November 26, 2020, defendant BRIANNA REED transferred \$2,000 through Apple Pay to defendant FREDRICK NORMAN.

116. On or about November 27, 2020:

a. Defendant BRIANNA REED transferred \$2,400 through Apple Pay to defendant FREDRICK NORMAN.

b. Defendants FREDRICK NORMAN and DEVIN CHURCH discussed the purchase of firearms by defendant CHURCH.

c. Defendant FREDRICK NORMAN transferred \$670 through Apple Pay to defendant DEVIN CHURCH.

d. Defendant DEVIN CHURCH purchased the following two firearms from GA Firing Line in Marietta, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number ABL138660; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number 1C000223.

e. Defendant FREDRICK NORMAN purchased the following three firearms from Cherokee Gun & Pawn Inc. in Canton, Georgia: a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABL149166; a Diamondback, model DB9, 9mm semi-automatic pistol, bearing serial number YL5434; and a Ruger, model EC9S, 9mm semi-automatic pistol, bearing serial number 45821197.

f. Defendant BRIANNA WALKER purchased a Taurus, model G3, 9mm semi-automatic pistol, bearing serial number ABL149272, from Cherokee Gun & Pawn Inc. in Canton, Georgia.

g. Defendant BRIANNA WALKER purchased the following two firearms from GA Firing Line in Marietta, Georgia: a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number 1C000034; and a Taurus, model G2C, 9mm semi-automatic pistol, bearing serial number 1C000244.

117. On or about November 29, 2020, defendants EDWIN BURGOS and FREDRICK NORMAN discussed defendant EDWIN BURGOS sending someone by plane to pick up firearms from defendant FREDRICK NORMAN.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 6 through 7 and 17 through 21, and Overt Acts 1 through 117 of Count One are incorporated here.

2. From in or around June 2020 through in or around December 2020, in the Eastern District of Pennsylvania, and elsewhere, defendants

**EDWIN BURGOS,
a/k/a “Rock,” and
KENNETH BURGOS,
a/k/a “Peppito,”**

willfully engaged in the business of dealing in firearms without being licensed to do so under the provisions of Chapter 44, Title 18, United States Code, and aided and abetted the same.

In violation of Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1)(D) and 2.

NOTICE OF FORFEITURE**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violation of Title 18, United States Code, Sections 371, 922(a)(1)(A), and 924(a)(1)(D), set forth in this indictment, defendants

**FREDRICK NORMAN
BRIANNA WALKER
a/k/a "Mars,"
STEPHEN NORMAN
CHARLES O'BANNON,
a/k/a "Chizzy,"
DEVIN CHURCH
a/k/a "Lant,"
ROGER MILLINGTON
ERNEST PAYTON
KENNETH BURGOS,
a/k/a "Peppito,"
EDWIN BURGOS,
a/k/a "Rock,"
ROSELMY RODRIGUEZ
a/k/a "Roselmy Peralta," and
BRIANNA REED**

shall forfeit to the United States of America the firearms involved in the commission of such violations, including:

	Make	Model	Serial Number
1	H&K	HK416, .22 caliber semi-automatic pistol	HB019845
2	Smith & Wesson	M&P 40 Shield, .40 caliber semi-automatic pistol	JEU4921
3	Smith & Wesson	M&P 40 Shield, .40 caliber semi-automatic pistol	JEU8102
4	Taurus	G2S, 9mm semi-automatic pistol	ABE615596
5	Taurus	G2S, 9mm semi-automatic pistol	ABE539524
6	Bersa	P380CC, .380 caliber semi-automatic pistol	E84366
7	Bersa	Thunder 380, .380 caliber semi-automatic pistol	F74863
8	Bersa	Thunder 9, 9mm semi-automatic pistol	B67627
9	Taurus	G2C, 9mm semi-automatic pistol	ABG650607
10	Taurus	G2C, 9mm semi-automatic pistol	ABG650578

	Make	Model	Serial Number
11	Taurus	G2C, 9mm semi-automatic pistol	ABG646726
12	Taurus	G2C, 9mm semi-automatic pistol	ABG648049
13	Taurus	G2C, 9mm semi-automatic pistol	ABG647665
14	Taurus	G2C, 9mm semi-automatic pistol	ABG646892
15	Taurus	TH9C, 9mm semi-automatic pistol	ABE573391
16	Taurus	TH9C, 9mm semi-automatic pistol	ABE571973
17	Smith & Wesson	SD9VE, 9mm semi-automatic pistol	FZL4810
18	Taurus	TH9C, 9mm semi-automatic pistol	ABE557048
19	Velocity Firearms	VMAC 45, .45 caliber semi-automatic pistol	P13817
20	Canik55	TP-9SF, 9mm semi-automatic pistol	16AT01708
21	Taurus	G2C, 9mm semi-automatic pistol	ABE598787
22	Taurus	G2C, .40 caliber semi-automatic pistol	ABE623519
23	Glock	23, .40 caliber semi-automatic pistol	GDC6447
24	Glock	23, .40 caliber semi-automatic pistol	GDC0023
25	Taurus	G2S, 9mm semi-automatic pistol	ABE622506
26	Springfield	XDS-45, .45 caliber semi-automatic pistol	HG128540
27	Taurus	G2S, 9mm semi-automatic pistol	ABG678229
28	Smith & Wesson	M&P 40 Shield, .40 caliber semi-automatic pistol	JEU6169
29	Taurus	G2S, 9mm semi-automatic pistol	ABG682394
30	Glock	43, 9mm semi-automatic pistol	ADZX271
31	Smith & Wesson	M&P 9 Shield, 9mm semi-automatic pistol	JEP4097
32	Smith & Wesson	M&P 9 Shield, 9mm semi-automatic pistol	JEV4125
33	Smith & Wesson	M&P 9 Shield, 9mm semi-automatic pistol	JEV4159
34	SAR Arms	B6, 9mm semi-automatic pistol	T1102-17E13979
35	Taurus	G2C, 9mm semi-automatic pistol	ABE598775
36	Taurus	G2C, 9mm semi-automatic pistol	ABE598805
37	Velocity Firearms	VMAC 45, .45 caliber semi-automatic pistol	P13498
38	Taurus	G2S, 9mm semi-automatic pistol	ABE573280
39	S&W	M&P Shield, 9mm semi-automatic pistol	JEU1938
40	S&W	M&P Shield, 9mm semi-automatic pistol	JEU4736
41	Smith & Wesson	M&P 9 Shield, 9mm semi-automatic pistol	JEU5437
42	Taurus	G3, 9mm semi-automatic pistol	ABE631701
43	Taurus	G3, 9mm semi-automatic pistol	ABE620167
44	Smith & Wesson	M&P 9 Shield, 9mm semi-automatic pistol	JEU4749
45	Smith & Wesson	M&P 9 Shield, 9mm semi-automatic pistol	JEV0022
46	Taurus	G2C, 9mm semi-automatic pistol	ABB331275
47	Smith & Wesson	M&P 9 Shield, 9mm semi-automatic pistol	JEV0640

	Make	Model	Serial Number
48	Smith & Wesson	M&P 9 Shield, 9mm semi-automatic pistol	JEV0034
49	Glock	45, 9mm semi-automatic pistol	ADXT043
50	Canik55	TP-9SA, 9mm semi-automatic pistol	20AP04078
51	Taurus	G3, 9mm semi-automatic pistol	ABE565012
52	SCCY	CPX-1, 9mm semi-automatic pistol	786030
53	Smith & Wesson	M&P 9 Shield, 9mm semi-automatic pistol	JEV0654
54	Smith & Wesson	M&P 40 Shield, .40 caliber semi-automatic pistol	JEU4948
55	Smith & Wesson	M&P 40 Shield .40 caliber semi-automatic pistol	JEU4924
56	F.N.	Five Seven, 5.7mm semi-automatic pistol	386380338
57	Taurus	G2S, 9mm semi-automatic pistol	ABG678392
58	Zastava	ZPAP85, 5.56mm semi-automatic pistol	Z85-008597
59	Ruger	AR-556, 5.56mm semi-automatic pistol	858-22206
60	SCCY	CPX-1, 9mm semi-automatic pistol	801500
61	SCCY	CPX-1, 9mm semi-automatic pistol	784818
62	SCCY	CPX-1, 9mm semi-automatic pistol	801508
63	SCCY	CPX-1, 9mm semi-automatic pistol	801512
64	Keltec	PF9, 9mm semi-automatic pistol	SYU74
65	Taurus	G2C, 9mm semi-automatic pistol	ABG732308
66	Taurus	G2C, 9mm semi-automatic pistol	ABH776168
67	Taurus	G3, 9mm semi-automatic pistol	ABH807772
68	Ruger	EC9S, 9mm semi-automatic pistol	457-87664
69	Kahr	CW9, 9mm semi-automatic pistol	EH7574
70	Taurus	G3C, 9mm semi-automatic pistol	ABH806615
71	Glock	43, 9mm semi-automatic pistol	AEUM366
72	CAI	Draco, 7.62mm semi-automatic pistol	RAS47111467
73	Taurus	G2C, 9mm semi-automatic pistol	ABH794177
74	Taurus	G3C, 9mm semi-automatic pistol	ABH775815
75	Ruger	EC9S, 9mm semi-automatic pistol	457-87615
76	Ruger	EC9S, 9mm semi-automatic pistol	457-89539
77	Ruger	EC9, 9mm semi-automatic pistol	457-87350
78	Smith & Wesson	SD9VE, 9mm semi-automatic pistol	FCM7569
79	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20S02183
80	Ruger	EC9S, 9mm semi-automatic pistol	457-86562
81	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20S02185
82	SAR	CM9, 9mm semi-automatic pistol	T1102-20BD50625
83	Taurus	TH9, 9mm semi-automatic pistol	ABJ855086
84	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U07084
85	Taurus	G2C, 9mm semi-automatic pistol	ABH818097

	Make	Model	Serial Number
86	Taurus	G2C, 9mm semi-automatic pistol	ABH818095
87	Stoeger	STR9C, 9mm semi-automatic pistol	T6429-20S02748
88	Smith & Wesson	SD40VE, .40 caliber semi-automatic pistol	FCK4204
89	Smith & Wesson	SD9VE, 9mm semi-automatic pistol	FCF9986
90	Ruger	Security 9, 9mm semi-automatic pistol	383-55479
91	Walther	PPS, 9mm semi-automatic pistol	AF7606
92	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U07038
93	Taurus	G3C, 9mm semi-automatic pistol	ABH847272
94	Ruger	EC9S, 9mm semi-automatic pistol	457-91806
95	Taurus	G3, 9mm semi-automatic pistol	ABH821551
96	Taurus	PT140, .40 caliber semi-automatic pistol	SIR37311
97	Taurus	G2C, 9mm semi-automatic pistol	ABH839281
98	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U07008
99	Ruger	EC9S, 9mm semi-automatic pistol	457-91675
100	Ruger	EC9S, 9mm semi-automatic pistol	457-91356
101	SAR	CM9, 9mm semi-automatic pistol	T1102-20BD50641
102	SAR	B6, 9mm semi-automatic pistol	T1102-20E03235
103	SAR	B6, 9mm semi-automatic pistol	T1102-20E03517
104	Ruger	EC9S, 9mm semi-automatic pistol	457-87841
105	Ruger	EC9S, 9mm semi-automatic pistol	457-87847
106	Taurus	PT140 G2, .40 caliber semi-automatic pistol	ABH811465
107	SAR USA	CM9, 9mm semi-automatic pistol	T1102-20BD50652
108	SAR USA	CM9, 9mm semi-automatic pistol	T1102-20BD50636
109	Canik	TP9SF, 9mm semi-automatic pistol	20AT30420
110	Canik	TP9SF, 9mm semi-automatic pistol	20AT30331
111	Stoeger	STR9, 9mm semi-automatic pistol	T6429-20U07659
112	Canik	TP9SF, 9mm semi-automatic pistol	20AT31266
113	Taurus	G3C, 9mm semi-automatic pistol	ABH852862
114	Taurus	G3, 9mm semi-automatic pistol	ABH824455
115	Ruger	EC9S, 9mm semi-automatic pistol	457-92291
116	Taurus	G3C, 9mm semi-automatic pistol	ABJ898166
117	Taurus	TH9C, 9mm semi-automatic pistol	TMC15868
118	Taurus	G3, 9mm semi-automatic pistol	ABJ871636
119	Canik	TP9SF, 9mm semi-automatic pistol	20AT31215
120	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U07887
121	Taurus	G3, 9mm semi-automatic pistol	ABH840139
122	Taurus	G3, 9mm semi-automatic pistol	ABG646262
123	Taurus	G2C, 9mm semi-automatic pistol	ABH847999
124	Ruger	EC9S, 9mm semi-automatic pistol	457-91950
125	Ruger	EC9S, 9mm semi-automatic pistol	457-92143

	Make	Model	Serial Number
126	Ruger	EC9S, 9mm semi-automatic pistol	457-94409
127	Ruger	EC9S, 9mm semi-automatic pistol	457-93835
128	SAR USA	B6, 9mm semi-automatic pistol	T1102-20E03528
129	SDS-Zicana	PX9, 9mm semi-automatic pistol	T0620-20BM08175
130	SCCY	CPX-1, 9mm semi-automatic pistol	C010686
131	Ruger	EC9S, 9mm semi-automatic pistol	457-93810
132	Ruger	EC9S, 9mm semi-automatic pistol	457-93861
133	Taurus	G3, 9mm semi-automatic pistol	ABH842227
134	Taurus	G3, 9mm semi-automatic pistol	ABH842226
135	Century	C39V2, 7.62mm semi-automatic pistol	C39P2A05579
136	Stoeger	STR-9C, 9mm semi-automatic pistol	T6429-20502866
137	Taurus	PT140 G2, .40 caliber semi-automatic pistol	ABJ904448
138	Glock	23C, .40 caliber semi-automatic pistol	ABKK586
139	Glock	27, .40 caliber semi-automatic pistol	BPKE598
140	Glock	43, 9mm semi-automatic pistol	AEWL261
141	Glock	19, 9mm semi-automatic pistol	BREG394
142	Taurus	G2C, 9mm semi-automatic pistol	ABH808311
143	Taurus	G2C, 9mm semi-automatic pistol	ABK990311
144	Glock	26, 9mm semi-automatic pistol	BRBX328
145	SAR	B6, 9mm semi-automatic pistol	T1102-20E03368
146	SAR	B6, 9mm semi-automatic pistol	T1102-20E02730
147	Glock	26, 9mm semi-automatic pistol	BRBX330
148	Taurus	G2C, 9mm semi-automatic pistol	ABJ917689
149	Taurus	G3, 9mm semi-automatic pistol	ABC348586
150	SCCY	CPX-2, 9mm semi-automatic pistol	C001681
151	Taurus	G2C, 9mm semi-automatic pistol	ABK977513
152	Smith & Wesson	SD9VE, 9mm semi-automatic pistol	FBH3711
153	Glock	26, 9mm semi-automatic pistol	BRBX327
154	Taurus	G2C, 9mm semi-automatic pistol	ABJ923092
155	Taurus	G2C, 9mm semi-automatic pistol	ABJ923072
156	SCCY	CPX-2, 9mm semi-automatic pistol	C000313
157	SCCY	CPX-2, 9mm semi-automatic pistol	C001683
158	Glock	26, 9mm semi-automatic pistol	BRBX150
159	Taurus	G2C, 9mm semi-automatic pistol	ABJ931509
160	Taurus	G2C, 9mm semi-automatic pistol	ABJ949538
161	Taurus	G2C, 9mm semi-automatic pistol	ABJ937774
162	Taurus	G2C, 9mm semi-automatic pistol	ABJ934011
163	Taurus	G2C, 9mm semi-automatic pistol	ABJ959614
164	Taurus	G2C, 9mm semi-automatic pistol	ABK966420

	Make	Model	Serial Number
165	Taurus	G2C, 9mm semi-automatic pistol	ABJ959654
166	Taurus	G2C, 9mm semi-automatic pistol	ABJ959038
167	Taurus	G2C, 9mm semi-automatic pistol	ABJ959228
168	Taurus	G2C, 9mm semi-automatic pistol	ABJ933152
169	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U07082
170	Taurus	G2C, 9mm semi-automatic pistol	ABJ933681
171	Taurus	G2C, 9mm semi-automatic pistol	ABJ931739
172	Taurus	G2C, 9mm semi-automatic pistol	ABK963503
173	Taurus	G2C, 9mm semi-automatic pistol	ABK963332
174	Taurus	G2C, 9mm semi-automatic pistol	ABJ937625
175	Taurus	G3, 9mm semi-automatic pistol	ABJ946815
176	SDS-Zicana	PX9, 9mm semi-automatic pistol	T0620-20BM08109
177	Taurus	PT740, .40 caliber semi-automatic pistol	SER23556
178	Taurus	G3, 9mm semi-automatic pistol	ABH842297
179	Glock	27, .40 caliber semi-automatic pistol	EHN837
180	Glock	30, .45 caliber semi-automatic pistol	BPUV689
181	Taurus	G2C, 9mm semi-automatic pistol	ABK998867
182	Taurus	G3, 9mm semi-automatic pistol	ABK015180
183	Taurus	G2C, 9mm semi-automatic pistol	ABK993628
184	Taurus	G3, 9mm semi-automatic pistol	ABJ871610
185	Glock	19, 9mm semi-automatic pistol	BRBL862
186	Glock	26, 9mm semi-automatic pistol	BPTZ570
187	Taurus	G2C, 9mm semi-automatic pistol	ABJ949933
188	Taurus	G3, 9mm semi-automatic pistol	ABH827269
189	Taurus	G3, 9mm semi-automatic pistol	ABJ871168
190	Ruger	EC9S, 9mm semi-automatic pistol	457-92015
191	Glock	23, .40 caliber semi-automatic pistol	AESR008
192	FNH	509, 9mm semi-automatic pistol	GKS0130904
193	Ruger	EC9S, 9mm semi-automatic pistol	458-04794
194	Ruger	EC9S, 9mm semi-automatic pistol	458-04917
195	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U08804
196	Ruger	EC9S, 9mm semi-automatic pistol	458-11734
197	Ruger	EC9S, 9mm semi-automatic pistol	458-13039
198	Glock	43, 9mm semi-automatic pistol	ADZV576
199	Taurus	G2C, 9mm semi-automatic pistol	ABG733875
200	Taurus	G2C, 9mm semi-automatic pistol	ABJ937174
201	Taurus	G2C, 9mm semi-automatic pistol	ABG733803
202	Charles Daly	Honcho Tactical, 12-gauge shotgun	20PA12V-1049
203	Ruger	EC9S, 9mm semi-automatic pistol	458-07351

	Make	Model	Serial Number
204	Taurus	G2C, 9mm semi-automatic pistol	ABJ937939
205	Taurus	G2C, 9mm semi-automatic pistol	ABJ938501
206	Smith & Wesson	SD40VE, .40 caliber semi-automatic pistol	DUK0733
207	Troy	Carbine, 5.56 semi-automatic pistol	F11194104
208	Taurus	G2C, 9mm semi-automatic pistol	ABJ943284
209	SCCY	CPX-2, 9mm semi-automatic pistol	C032517
210	SCCY	CPX-2, 9mm semi-automatic pistol	C032507
211	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U07010
212	Ruger	EC9S, 9mm semi-automatic pistol	458-07019
213	Ruger	EC9S, 9mm semi-automatic pistol	458-07052
214	Ruger	EC9S, 9mm semi-automatic pistol	458-07320
215	Ruger	EC9S, 9mm semi-automatic pistol	458-12891
216	Ruger	EC9S, 9mm semi-automatic pistol	458-12246
217	Ruger	EC9S, 9mm semi-automatic pistol	458-07039
218	MPA	MPA30T, 9mm semi-automatic pistol	FX15843
219	Ruger	EC9S, 9mm semi-automatic pistol	458-07311
220	Ruger	EC9S, 9mm semi-automatic pistol	458-13128
221	SAR Arms	2000, 9mm semi-automatic pistol	T1102-19B04765
222	Glock	19, 9mm semi-automatic pistol	BREP341
223	Glock	26, 9mm semi-automatic pistol	BPTZ767
224	Springfield	Hellcat, 9mm semi-automatic pistol	BY391042
225	Glock	26, 9mm semi-automatic pistol	BRBW713
226	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U10663
227	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U10660
228	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U10661
229	Taurus	G2C, 9mm semi-automatic pistol	ABL088129
230	Springfield	Hellcat, 9mm semi-automatic pistol	BY420388
231	SCCY	CPX-2, 9mm semi-automatic pistol	C030475
232	Taurus	G2C, 9mm semi-automatic pistol	ABL093519
233	Taurus	G2C, 9mm semi-automatic pistol	ABL093202
234	Taurus	G2C, 9mm semi-automatic pistol	ABL088627
235	Taurus	G2C, 9mm semi-automatic pistol	ABL088668
236	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U10091
237	SCCY	CPX-2, 9mm semi-automatic pistol	C030089
238	SCCY	CPX-2, 9mm semi-automatic pistol	C029719
239	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U10119
240	Taurus	G2C, 9mm semi-automatic pistol	ABK078230
241	Taurus	G2C, 9mm semi-automatic pistol	ABJ937839
242	SCCY	CPX-2, 9mm semi-automatic pistol	C030604
243	Taurus	G2C, 9mm semi-automatic pistol	ABJ908551

	Make	Model	Serial Number
244	Taurus	G2C, 9mm semi-automatic pistol	ABG733746
245	Taurus	G3, 9mm semi-automatic pistol	ABK981714
246	Glock	19X, 9mm semi-automatic pistol	BRPW460
247	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U10020
248	Taurus	G2C, 9mm semi-automatic pistol	ABL082282
249	Glock	19, 9mm semi-automatic pistol	SVW132
250	Glock	48, 9mm semi-automatic pistol	BRLF503
251	Glock	43, 9mm semi-automatic pistol	AEWH303
252	Taurus	G2C, 9mm semi-automatic pistol	ABL094253
253	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U10142
254	Taurus	G2C, 9mm semi-automatic pistol	ABL081554
255	Taurus	G2C, 9mm semi-automatic pistol	ABL081443
256	Taurus	G3C, 9mm semi-automatic pistol	ABL115307
257	Taurus	G3C, 9mm semi-automatic pistol	ABL090156
258	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U11628
259	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U10128
260	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U11083
261	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U11202
262	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U11203
263	Taurus	G2C, 9mm semi-automatic pistol	ABJ914282
264	Taurus	G2C, 9mm semi-automatic pistol	ABJ914281
265	Taurus	G2C, 9mm semi-automatic pistol	ABJ914407
266	Taurus	G2C, 9mm semi-automatic pistol	ABJ944052
267	Taurus	G2C, 9mm semi-automatic pistol	ABJ949867
268	Taurus	G2C, 9mm semi-automatic pistol	ABJ950243
269	Taurus	G2C, 9mm semi-automatic pistol	ABJ950322
270	Taurus	G2C, 9mm semi-automatic pistol	ABL094159
271	Taurus	G2C, 9mm semi-automatic pistol	ABK016790
272	Taurus	G2C, 9mm semi-automatic pistol	ABK016702
273	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U11000
274	Stoeger	STR-9, 9mm semi-automatic pistol	T6429-20U10983
275	Taurus	G2C, 9mm semi-automatic pistol	ABK016914
276	Taurus	G2C, 9mm semi-automatic pistol	ABK016795
277	Taurus	G2C, 9mm semi-automatic pistol	ABK016742
278	Taurus	G2C, 9mm semi-automatic pistol	ABK016665
279	Taurus	G2C, 9mm semi-automatic pistol	ABJ949910
280	Taurus	G2C, 9mm semi-automatic pistol	ABJ950382
281	Taurus	G2C, 9mm semi-automatic pistol	ABK986101
282	Taurus	G2C, 9mm semi-automatic pistol	ABL093031
283	Taurus	G3, 9mm semi-automatic pistol	ABL149272

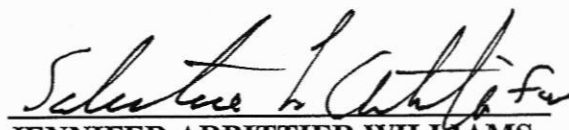
	Make	Model	Serial Number
284	Taurus	G2C, 9mm semi-automatic pistol	1C000034
285	Taurus	G2C, 9mm semi-automatic pistol	1C000244
286	Taurus	G2C, 9mm semi-automatic pistol	ABL138660
287	Taurus	G2C, 9mm semi-automatic pistol	1C000223
288	Taurus	G3, 9mm semi-automatic pistol	ABL149166
289	Diamondback	DB9, 9mm semi-automatic pistol	YL5434
290	Ruger	EC9S, 9mm semi-automatic pistol	45821197

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:



GRAND JURY FOREPERSON


JENNIFER ARBITTIER WILLIAMS
 United States Attorney